

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

RAMIRO FELIX GONZALES,
Plaintiff,

V.

BRYAN COLLIER, Executive Director
of the Texas Department of Criminal
Justice, BOBBY LUMPKIN, Director
of the Texas Department of Criminal
Justice—Correctional Institutions
Division, and DENNIS CROWLEY,
Warden of the Huntsville Unit,
Defendants.

CIVIL ACTION NO. 4:21-CV-00828

DEFENDANTS' BRIEF IN SUPPORT OF REDACTIONS

The Court ordered Defendants to submit a redacted version of the Sealed Opinion and Order on Issuance of the Preliminary Injunction suitable for public filing. ECF No. 93. Defendants Bryan Collier, Bobby Lumpkin, and Dennis Crowley submit the attached redacted version of the Order with the following justifications.

The proposed redactions protect details of the execution chamber that are not otherwise publicly available. The information includes measurements, detailed descriptions, photographs, and other security components of the execution chamber. This information, if publicly disclosed, could be used to circumvent security measures in the execution chamber. If a person possessed these details ahead of an execution, the information could be used to plan ways to circumvent security or to disrupt an execution. The redactions were made with the goal of maximizing the amount of publicly available information, but while maintaining

ultra-sensitive information necessary to maintain the security of the execution chamber.

Respectfully submitted,

KEN PAXTON

Attorney General of Texas

BRENT WEBSTER

First Assistant Attorney General

GRANT DORFMAN

Deputy First Assistant Attorney General

SHAWN E. COWLES

Deputy Attorney General for Civil Litigation

SHANNA E. MOLINARE

Division Chief

Law Enforcement Defense Division

/s/ Leah O'Leary

LEAH O'LEARY

Assistant Attorney General

Attorney-in-Charge

State Bar No. 24079074

Southern District No. 1563191

Leah.Oleary@oag.texas.gov

Law Enforcement Defense Division

OFFICE OF THE ATTORNEY GENERAL

P.O. Box 12548

Austin, Texas 78711-2548

(512) 463-2080 / Fax (512) 370-9918

MATTHEW OTTOWAY

Assistant Attorney General

Criminal Appeals Division

OFFICE OF THE ATTORNEY GENERAL

State Bar No. 24047707

Southern District Admission No. 892308

ATTORNEYS FOR DEFENDANTS

COLLIER, LUMPKIN, AND CROWLEY

CERTIFICATE OF SERVICE AND ELECTRONIC FILING

I, **LEAH O'LEARY**, hereby certify that on July 15, 2022, I electronically filed the foregoing document with the Clerk of the Court for the United States Court for the Southern District of Texas using the electronic case-filing (ECF) system of the Court, which electronically serves all counsel of record and registered users in this case.

/s/ Leah O'Leary

LEAH O'LEARY

Assistant Attorney General